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October 8, 2024

**VIA ECF**

The Honorable Ronnie Abrams  
 United States District Judge  
 Southern District of New York  
 Thurgood Marshall Courthouse  
 40 Foley Square, Room 1506  
 New York, NY 10007

Re: [Eckhart v. Fox News Network, LLC, et al.; Case No. 20-cv-5593 \(RA\)\(GWG\)](#)

Dear Judge Abrams,

We represent Plaintiff in this action and write to request an extension to oppose Defendants' motions for summary judgment from October 24, 2024 to November 15, 2024. Defendants consent to this request. The reason for the request is that the original October 24, 2024 deadline was based on a schedule that would have required Defendants to file their motions by September 12, 2024. As a result of various extensions, Defendant Fox News Network, LLC ("Fox News") filed its motion on September 23, 2024, and Defendant Ed Henry ("Mr. Henry") filed his motion on September 30, 2024. Moreover, I have significant pre-trial filings due on November 1, 2024, as well as ongoing pretrial submissions after that date, in connection with a matter that is scheduled for trial on December 2, 2024. The November 15, 2024 deadline will give me adequate time to prepare oppositions to Defendants' motions and meet my other non-moveable deadlines.

Fox News has advised that it will propose a reply deadline after reviewing our opposition papers. Mr. Henry has requested the same extension on his reply papers as we are receiving for our opposition papers, which would result in a reply filing deadline of December 16, 2024.

We thank Your Honor for the Court's time and consideration of this matter.

Respectfully submitted,

Michael J. Willemin

Application granted. Plaintiff shall file her opposition by November 15, 2024 and Defendant Henry shall file his reply by December 16, 2024. Defendant Fox News shall also file its reply by December 16, 2024 but, if necessary, may request an extension pursuant to the Court's Individual Rule 1(D).

SO ORDERED.

Hon. Ronnie Abrams  
 October 9, 2024